AMO REPORTS 83-16

PROVINCIAL FLOOD PLAIN POLICIES: THE AMO PERSPECTIVE

THE ASSOCIATION OF MUNICIPALITIES OF ONTARIO
NOVEMBER 1983

84- 4668 /

ASSOCIATION OF MUNICIPALITIES OF ONTARIO

The Association of Municipalities of Ontario, a non-partisan voluntary organization, is united to promote the values of the municipal government system and the status of the municipal level of government as a vital and essential component of the total intergovernmental framework of Ontario and Canada.

The Association acts as the collective voice of Ontario's municipal governments and is organized to accomplish through cooperation and coordination, what the majority have neither the time nor the resources to do individually.

The Association represents some six hundred (600) municipal governments throughout Ontario. The governing body is composed of some eighty (80) municipal elected and appointed officials, who in turn represent a wide-range of municipal government interest.

The following sections and affiliated municipal professional associations form an important part of the Association's structure and therefore, play an important part in its activities in terms of the Board of Directors, program and policy development:

Association Sections:

* County and Regional Section
* Large Urban Section
* Northern Ontario Section (FONOM/NOMA)
* Rural (ROMA) Section
* Organization of Small Urban Municipalities Section

Association Affiliates:

* Association of Municipal Clerks and Treasurers of Ontario
* Association of Municipal Tax Collectors of Ontario
* Municipal Engineers Association
* Ontario Municipal Administrators Association
* Ontario Municipal Personnel Association
* Ontario Municipal Social Services Association
* Society of Directors of Municipal Recreation of Ontario

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"AMO Reports 83-16" was submitted to the Honourable Claude Bennett, Minister of Municipal Affairs and Housing, and the Honourable Alan Pope, Minister of Natural Resources, on December 1, 1983.

Provincial Flood Plain Policies - The AMO Perspective

1. INTRODUCTION

In August of 1983 the Minister of Natural Resources, the Honourable Alan Pope, announced the establishment of a Provincial Task Force responsible for reviewing the Provincial Flood Plain Criteria. This Task Force held meetings in several municipalities throughout Ontario to obtain input from the general public concerning the Provincial policies. Subsequent to these meetings the seven-member Task Force was to prepare a report for the consideration of the Minister prior to the adoption of a "provincial policy statement" on flood plains under the provisions of the Planning Act, 1983.

The following AMO Report will outline the concerns of the Association of Municipalities of Ontario with respect to both the Provincial Flood Plain Criteria, adopted by Cabinet in September, 1982, and the interim implementation guidelines, dated April, 1983, and make recommendations for the consideration of the Minister in the review of these policies.

2. FLOOD PLAIN CRITERIA

2.1 Principles and Objectives

The Association is generally in agreement with the stated objectives of flood plain management, these being:

- to prevent loss of life
- to minimize property damage and social disruption
- to encourage a co-ordinated approach to the use of land and the management of water

The Association recognizes the importance of co-ordination between community development and flood plain management in order to achieve the other stated objectives of the Ministry in its role as the lead agency responsible for flood emergencies. AMO believes that municipalities, as the "lead agency" responsible for implementing land use policies throughout the Province, should be recognized as a primary agent in achieving this co-ordinated approach, something that the present flood policies do not do.

The Association also agrees with the general principles as outlined, including:

- flood plain management policies must be based on an evaluation of all relevant social, economic, physical and environmental factors
- flood plain management policies must take place within an overall co-ordinated land use and watershed planning framework
- whenever feasible, existing developments within the flood plain are to be protected against major flood losses
- future land uses which will be susceptible to significant flood damages or which will increase flood damages to existing uses must not be permitted within the flood plain
- flood plain management policies must be developed and administered in a manner which promotes public understanding and acceptance

This general agreement is tempered by several factors. The Association believes that the criteria presently used to designate the "flood plain" is unduly severe and stringent. The Association believes that there has been a failure, on the part of provincial and conservation authorities when designating flood plain areas, to recognize local conditions and the flood prevention measures implemented. The Association believes that municipalities should be the body responsible for and with the authority to implement flood plain policies locally and that the necessary legislative provisions should be enacted to provide this authority. Each of these matters will be addressed further under the discussion of the six-point Provincial flood plain policy.

With respect to the five principles enunciated above, the Association believes that the "theme" of "significant flood damage" in the fourth principle should be carried throughout that principle by inserting the word "significantly" when speaking of increased flood damage to existing uses.

2.2 Flood Plain Policies

The existing six Provincial "Flood Plain Criteria" are denoted by capital letters in this section of the report.

2.2.1

THE REGULATORY FLOOD FOR DESIGNATION OF FLOOD PLAINS IN ONTARIO IS DEFINED AS THE REGIONAL FLOOD OR THE 100-YEAR FLOOD, WHICHEVER IS GREATER.

The Association considers the use of the regional floods (Hurricane Hazel and Timmins Storm) as the regulatory flood for the majority of the Province of Ontario to be unfair and unrealistic. These storms impose stringent restrictions on land use within many municipalities often without historical basis and fail to consider the local topography, history of flooding, type of watercourse, the costs and benefits associated with the regional criteria, the flood prevention measures that have been implemented locally and the flood warning systems that are in place.

In order to provide for both consistency and flexibility the Association believes that regulatory flood criteria should be identified that can be utilized across the Province, criteria that is, to a some extent, predictable with respect to frequency of flood and flood level and which would comply with existing federal flood-related programs.

Within this regulatory flood level, flexibility should be provided through the application of the two-zone or special policy area concepts. The floodway and flood fringe levels associated with these two concepts could be determined and applied locally, by the municipality based on the factors identified above and with the co-operation of the conservation authority or the Ministry of Natural Resources, where no conservation authority exists. This approach would, in the opinion of AMO, provide a reasonable and acceptable level of protection that would appear to fulfill the obligations of the Provincial Government with respect to the Canada-Ontario Flood Damage Reduction Agreement. For this purpose the regulatory flood level for the Province should be established as the 1 in 100-year flood (maximum). Within the 1 in 100-year flood the floodway and flood fringe designations would be determined. The floodway would be determined by the 1 in 100-year flood or some lesser flood level (i.e. 1 in 50, 1 in 25, etc.) depending on the local situation. Provisions could also be made for the municipality to increase the floodway to a level above the 1 in 100-year flood if local conditions so required.

Therefore AMO recommends:

1. That the Provincial Government adopt one regulatory flood criterion to be applied across the Province of Ontario.

2. That that regulatory flood criterion not exceed the one in 100-year flood.

3. That the two-zone (floodway and flood fringe) and/or special policy area concepts be used to provide flexibility within the 1 in 100-year regulatory flood limits allowing for the establishment of flood plain policies that address the local municipal conditions and situation.

This would permit the problem of flood damage reduction and flood plain management to be addressed in a manner that was effective, justifiable and in most instances acceptable since it could be adapted to local conditions. The 1 in 100-year flood could be identified and the two-zone and special policy area approaches could be utilized to provide flexibility and not unduly restrict development while at the same time allowing for some additional control to be exercised over development within such areas through the official plan, zoning and site plan control processes.

2.2.2

CONSERVATION AUTHORITIES IN ONTARIO, OR WHERE NO AUTHORITY EXISTS, THE MINISTRY OF NATURAL RESOURCES, IN CO-OPERATION WITH THE WATERSHED MUNICIPALITIES, HAVE THE OPTION OF SELECTIVE APPLICATION OF THE TWO-ZONE FLOODWAY-FLOOD FRINGE CONCEPT;

THE FLOODWAY IS TO BE BASED ON THE MINIMUM OF THE 100-YEAR FLOOD FOR THOSE AREAS WHERE THE TWO-ZONE CONCEPT IS ADOPTED;

DEVELOPMENT IN THE FLOOD FRINGE IS TO BE PROTECTED TO THE LEVEL OF THE REGULATORY FLOOD BY SUITABLE FLOOD DAMAGE REDUCTION MEASURES.

With respect to the implementation of the two-zone floodway-flood fringe concept (T-Z), the Association believes that the municipality, as the level of government responsible for regulating land use at the municipal level, should be primarily responsible for initiating the application of such a measure. This should be done in consultation with the conservation authority and the Ministry of Natural Resources as the agencies responsible for water management, flood control and flood emergencies. At the same time, AMO recognizes that some municipalities may not possess the technical and/or administrative capabilities to implement the T-Z concept. In such instances provision should be made for a council to request that the local conservation authority or the local district office of the Ministry of Natural Resources examine the feasibility of applying the T-Z concept within a municipality.

Given AMO's previous recommendations regarding the use of the 1 in 100-year flood as the regulatory flood, the two zones, floodway and flood fringe, would be identified by applying all relevant social, economic, environmental and physical factors to provide a comprehensive cost-benefit analysis of the situation. In this way the floodway and flood fringe "zones" could address the local situation more readily than an arbitrarily assigned definition of floodway (that being the 1 in 100-year flood as defined in the Provincial policy).

In situations where the conservation authority or the Ministry and the municipality responsible could not agree on the designation of the two zones, some form of independent arbitration system should be established to settle disputes. This arbitration system could be structured in a manner similar to the Ontario Drainage Tribunal established under the Drainage Act.

Therefore AMO recommends:

4. That municipalities be the body responsible for initiating and approving local policies and controls which may be necessary to implement and maintain Provincial flood plain policies.

5. That municipalities be responsible for initiating and applying the T-Z concept selectively within those areas under their jurisdiction.

6. That municipalities consult with the appropriate conservation authority or the Ministry of Natural Resources, where no conservation authority exists, to provide for co-ordination in the application of flood plain management policies.

7. That municipalities be authorized to delegate, if they so desire, the responsibility for application of the T-Z concept to the local conservation authority or the local district office of the Ministry of Natural Resources.

8. That an independent arbitration system be established to settle disputes between municipalities and conservation authorities or the Ministry of Natural Resources related to application of the T-Z concept.

9. That this arbitration system be established and operate in a manner similar to the Ontario Drainage Tribunal constituted under the Drainage Act.

10. That development within the flood fringe of the T-Z area be protected to the level of the regulatory flood by suitable flood damage reduction measures.

2.2.3

WHERE STRICT APPLICATION OF POLICIES 1 AND/OR 2 IS NOT FEASIBLE, THE CONCEPT OF SPECIAL POLICY AREAS WITHIN FLOOD PLAINS IS RECOGNIZED AND CONTROLLED DEVELOPMENT MAY BE PERMITTED, ONCE SUCH AREAS ARE DESIGNATED AND APPROVED BY THE CONSERVATION AUTHORITY AND THE MINISTRIES OF NATURAL RESOURCES AND MUNICIPAL AFFAIRS AND HOUSING. THE MINISTRIES OF THE ENVIRONMENT AND NORTHERN AFFAIRS, WHEN APPROPRIATE, ARE TO BE CONSULTED ABOUT THE SPECIAL POLICY STATUS FOR SUCH AREAS.

Where application of the regulatory flood or the flexible two-zone approach outlined above would result in portions of the municipality which are presenty developed being unavailable for further development or redevelopment, or where approved new developments may be affected adversely, AMO believes that municipalities must have the option of applying for special

policy area status. Such areas should be designated by the municipality in consultation with the conservation authority or the Ministry of Natural Resources and approved by the Ministry. As suggested in the case of the T-Z concept, the municipality should be authorized to request assistance from the local conservation authority or the Ministry of Natural Resources in the formulation of a special policy area policy.

The Association believes that the situations to which the "special policy area" concept could apply should not be restricted to core areas and low flow (shallow floods at a low velocity) conditions. The criteria used to determine the appropriateness of utilizing the "special policy area" concept must include economic feasibility and cost-benefit analysis as well as the municipal land use priorities as established in the official plan. The flexibility which this concept would appear to provide for municipalities must be readily available and maintained.

Therefore AMO recommends:

11. That the special policy area option be maintained to accommodate instances in which the identified floodway would restrict development or redevelopment in areas necessary for the well-being of the community.

12. That the municipality, in consultation with the conservation authority or the Ministry of Natural Resources where no conservation authority exists, be responsible for designating special policy areas subject to the approval of the Ministries of Natural Resources and Municipal Affairs and Housing.

2.2.4

CONSERVATION AUTHORITIES ARE TO CONTINUE TO ADMINISTER FILL AND CONSTRUCTION REGULATIONS, IN ACCORDANCE WITH THE CONSERVATION AUTHORITIES ACT;

CONSTRUCTION REGULATIONS MADE UNDER THE CONSERVATION AUTHORITIES ACT MAY BE RESCINDED FOR THOSE AREAS WHERE A MUNICIPALITY HAS ADOPTED OFFICIAL PLAN POLICIES AND ZONING BY-LAWS WHICH COMPLY WITH

THE OBJECTIVES OF FLOOD PLAIN MANAGEMENT, AND ACCORD WITH THE PROCEDURAL POLICIES ESTABLISHED BY THE CONSERVATION AUTHORITY AND THE MINISTRIES OF NATURAL RESOURCES AND MUNICIPAL AFFAIRS AND HOUSING.

The Association endorses the retention of this policy including the option to rescind the conservation authority's construction regulations where the municipality has adopted appropriate official plan policies and zoning provisions.

In this regard reference is made to an earlier recommendation made by the Association in AMO Report 37: Flood Plain Management Policies, as follows:

> "That appropriate amendments be made to Section 35(a) of the Planning Act which would empower a municipality to require the owner of land to include "flood control measures" or "flood damage reduction measures" in any plans or drawings submitted for approval under this section and which would empower a municipality to inquire specifically into and require agreements respecting any matters related to flood control or flood damage reduction."[1]

Although Section 34(1)5 of the Planning Act, 1983 provides the municipalities with zoning powers to require floodproofing through the regulation of the elevation of openings in buildings, AMO would reiterate its belief that site plan control (Section 40) should include provisions empowering the municipality to enter into agreements with the owner of the land respecting those matters related to flood control and flood damage reduction. This would be in line with the powers provided in Section 50(4) of the Planning Act, 1983 relative to subdivisions.

According to the interim implementation guidelines, changes to the Building Code Act would be required before conservation authority regulations could be rescinded. The Association

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1 AMO Report 37: Flood Plain Management Policies; The Association of Municipalities of Ontario; August, 1980; Page 14. (The appropriate reference would now be Section 40 of the Planning Act, 1983.)

believes that these amendments, along with those recommended for Section 40 of the Planning Act, 1983, would provide those municipalities that have the technical and administrative capabilities and appropriate official plan and zoning by-law provisions with the mechanism necessary to achieve the goals and objectives of flood plain management, without the use of conservation authority regulations.

In instances where conservation authorities file construction, fill and/or waterway alteration regulations, the Association believes that the authority should consult with local municipalities prior to submission of the regulations to the Minister.

Therefore AMO recommends:

13. That Section 40 of the Planning Act, 1983 be amended to empower municipalities to require the owner of land to enter into agreements respecting those matters related to flood control and/or flood damage reduction.

14. That the Building Code Act and the Building Code be amended to require the professional design of buildings within the flood plain and to ensure the structural adequacy of developments within the floodplain, respectively.

15. That the Conservation Authorities Act be amended to require that conservation authorities obtain the approval of local municipalities within their jurisdiction prior to filing construction, fill and/or waterway alteration regulations.

2.2.5

THE MINISTRY OF NATURAL RESOURCES WILL PROVIDE DETAILED POLICIES AND TECHNICAL GUIDELINES FOR THE CALCULATION AND MAPPING OF FLOODWAY AND FLOOD PLAIN LANDS;

THE MINISTRY OF MUNICIPAL AFFAIRS AND HOUSING, IN CO-OPERATION WITH THE MINISTRY OF NATURAL RESOURCES, WILL DEVELOP POLICIES AND PROCEDURES FOR THE

ADMINISTRATION OF THE PLANNING ACT, AS IT RELATES TO FLOOD PLAIN LANDS, TO COMPLY WITH THE OBJECTIVES OF FLOOD PLAIN MANAGEMENT;

THE MINISTRIES OF NATURAL RESOURCES AND MUNICIPAL AFFAIRS AND HOUSING, IN CO-OPERATION WITH CONSERVATION AUTHORITIES, WILL DEVELOP TECHNICAL CRITERIA AND PROCEDURES FOR THE SELECTIVE APPLICATION OF THE TWO-ZONE FLOODWAY-FLOOD FRINGE CONCEPT AND FOR THE DESIGNATION OF "SPECIAL POLICY AREAS".

The Association suggests that the Ministry review the model and its inherent assumptions related to soil moisture content, etc. currently used to calculate flood lines. The operation of the model and the rationale for using certain assumptions should be clearly and completely defined so as to be understood by the general public.

Therefore AMO recommends:

16. That the Ministry of Natural Resources review its computer flood model and the assumptions associated with it and provide a clear and complete definition of the operation of the model and the assumptions used.

The Association would support the development of a system such as the "flexible hazard land policy approach" outlined in the interim flood plain implementation guidelines. The guidelines state that the boundary of the hazard land designation could be changed without requiring an official plan amendment. This system should be described in detail in an implementation guideline and should recognize the existence of the Planning Act which establishes certain conditions relative to changes to official plans and zoning by-laws, the use of site plan controls and subdivision agreements, and, the provisions to be provided in the Building Code Act and the Building Code relative to construction in flood susceptible areas.

Therefore AMO recommends:

17. That the implementation guidelines outline in detail the flexible hazard land policy approach.

2.2.6

LOCAL MUNICIPALITIES HAVE JURISDICTION FOR URBAN STORMWATER MANAGEMENT IN DRAINAGE AREAS OF LESS THAN 125 ha, AND THESE DRAINAGE AREAS ARE EXEMPT FROM CONSTRUCTION REGULATIONS MADE UNDER THE CONSERVATION AUTHORITIES ACT;

CONSERVATION AUTHORITIES WILL DELEGATE JURISDICTION FOR URBAN STORMWATER MANAGEMENT OVER LARGER WATERSHEDS, REGARDLESS OF SIZE, TO LOCAL MUNICIPALITIES ONCE THE MUNICIPALITIES ADOPT STORMWATER MANAGEMENT PLANS WHICH COMPLY WITH THE OBJECTIVES OF FLOOD PLAIN MANAGEMENT, AND ACCORD WITH THE PROCEDURAL POLICIES ESTABLISHED BY CONSERVATION AUTHORITIES AND THE MINISTRIES OF NATURAL RESOURCES, MUNICIPAL AFFAIRS AND HOUSING AND THE ENVIRONMENT;

THE MINISTRIES OF NATURAL RESOURCES, MUNICIPAL AFFAIRS AND HOUSING, AND THE ENVIRONMENT, IN CO-OPERATION WITH CONSERVATION AUTHORITIES, WILL DEVELOP POLICIES, TECHNICAL GUIDELINES AND PROCEDURES FOR THE PREPARATION AND APPROVAL OF STORMWATER MANAGEMENT PLANS.

AMO's major concern with respect to this policy is the total exclusion of municipalities and lack of consultation with municipalities. The policy as outlined fails to recognize the importance of municipal involvement in the development of criteria and procedures. At the same time it places the onus on municipalities to formulate and adopt so-called "stormwater management plans" if it is to retain any control over the regulation of construction within stormwater drainage areas larger than 125 ha. The policy does not define the term "stormwater management plan" nor does it identify the status of this plan within the framework of the municipal official plan. There is no discussion of the interrelationship between policy #6 and policy #4 and yet each of these policies refers to the rescinding of construction regulations provided certain conditions are met by the municipality.

The Association concurs with the need to address the issue of urban stormwater management within the context of flood control and water management. At the same time it believes that municipalities, through AMO, must be involved in the development of programs and policies which they will be responsible for implementing.

Therefore AMO recommends:

18. That municipal representatives be involved at an early stage in the development of policies, technical guidelines and procedures for the preparation and approval of stormwater management plans.

3. ADDITIONAL CONCERNS

The Association has several other concerns it would like to express at this time for the Minister's consideration. These concerns relate to liability, property acquisition, lots of record, Canada Mortgage and Housing Corporation mortgage lending practices and shoreline management policies.

With respect to liability, the Association believes that the legal responsibilities of all concerned, including the Provincial Government, municipalities, conservation authorities and property owners, for development within an area(s) defined as being susceptible to floods must be defined in either the policy statement or the accompanying guideline. AMO also believes that some method, such as registration of a notice on title, should be developed to indicate to subsequent potential owners that a particular property may be within the flood plain of a given storm.

A further concern is the possibility that municipalities could either lose a considerable amount of tax revenue due to assessment appeals resulting from properties being identified as being within a flood plain, or, that they may be directed to acquire properties which they have identified as being within a floodway and as such may not be eligible for further development or redevelopment. This is especially true as it applies to lots of record in situations where historic development rights may disappear with the identification of the flood plain. Both of these issues must be addressed in the provincial policy statement.

Indications are that CMHC will no longer provide mortgage funds for developments "placed in a flood risk area and subject to flood damage"[2]. The Association requires a clarification of whether this would apply to any redevelopment of properties within an identified flood plain or to new development only. The application of this policy to existing developments could place a significant burden on individuals wishing to redevelop or rehabilitate their property, sell their property or renew their mortgages.

With respect to shoreline management policies, it would appear that many of the problems which AMO has identified relative to flood plain policies would also apply to the provincial shoreline management policies. As such AMO requests that the Minister of Natural Resources consider undertaking an extensive review of these policies, including extensive consultation with municipalities.

Therefore AMO recommends:

19. That the Ministry of Natural Resources define, within the provincial policy statement on flood plains, the responsibilities of the Provincial Government, municipalities, conservation authorities and property owners relative to new development, infill and redevelopment in areas identified as being susceptible to flooding under the regulatory flood.

20. That a method be developed to notify potential land owners of the fact that certain property may be subject to flooding given a specified intensity of storm.

21. That the Provincial Government address the issue of decreased tax revenues and increased land acquisition costs which may result from the identification and designation of flood plains.

22. That CMHC be requested to clarify its position relative to the provision of mortgage funding for existing developed properties within an identified flood plain.

23. That the Minister of Natural Resources undertake a public review of provincial shoreline management policies.

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2 Excerpt from, A New Approach to an Old Problem: The Canada/Ontario Flood Damage Reduction Program; Environment Canada/Ministry of Natural Resources; March, 1982.

4. SUMMARY OF RECOMMENDATIONS

1. That the Provincial Government adopt regulatory flood criterion to be applied across the Province of Ontario.

2. That that regulatory flood criterion not exceed the one in 100-year flood.

3. That the two-zone (floodway and flood fringe) and/or special policy area concepts be used to provide flexibility within the 1 in 100-year regulatory flood limits allowing for the establishment of flood plain policies that address the local municipal conditions and situation.

4. That municipalities be the body responsible for initiating and approving local policies and controls which may be necessary to implement and maintain Provincial flood plain policies.

5. That municipalities be responsible for initiating and applying the T-Z concept selectively within those areas under their jurisdiction.

6. That municipalities consult with the appropriate conservation authority or the Ministry of Natural Resources, where no conservation authority exists, to provide for co-ordination in the application of flood plain management policies.

7. That municipalities be authorized to delegate, if they so desire, the responsibility for application of the T-Z concept to the local conservation authority or the local district office of the Ministry of Natural Resources.

8. That an independent arbitration system be established to settle disputes between municipalities and conservation authorities or the Ministry of Natural Resources related to application of the T-Z concept.

9. That this arbitration system be established and operate in a manner similar to the Ontario Drainage Tribunal constituted under the Drainage Act.

10. That development within the flood fringe of the T-Z area be protected to the level of the regulatory flood by suitable flood damage reduction measures.

11. That the special policy area option be maintained to accommodate instances in which the identified floodway would restrict development or redevelopment in areas necessary for the well-being of the community.

12. That the municipality, in consultation with the conservation authority or the Ministry of Natural Resources where no conservation authority exists, be responsible for designating special policy areas subject to the approval of the Ministries of Natural Resources and Municipal Affairs and Housing.

13. That Section 40 of the Planning Act, 1983 be amended to empower municipalities to require the owner of land to enter into agreements respecting those matters related to flood control and/or flood damage reduction.

14. That the Building Code Act and the Building Code be amended to require the professional design of buildings within the flood plain and to ensure the structural adequacy of developments within the floodplain, respectively.

15. That the Conservation Authorities Act be amended to require that conservation authorities obtain the approval of local municipalities within their jurisdiction prior to filing construction, fill and/or waterway alteration regulations.

16. That the Ministry of Natural Resources review its computer flood model and the assumptions associated with it and provide a clear and complete definition of the operation of the model and the assumptions used.

17. That the implementation guidelines outline in detail the flexible hazard land policy approach.

18. That municipal representatives be involved at an early stage in the development of policies, technical guidelines and procedures for the preparation and approval of stormwater management plans.

19. That the Ministry of Natural Resources define, within the provincial policy statement on flood plains, the responsibilities of the Provincial Government, municipalities,

conservation authorities and property owners relative to new development, infill and redevelopment in areas identified as being susceptible to flooding under the regulatory flood.

20. That a method be developed to notify potential land owners of the fact that certain property may be subject to flooding given a specified intensity of storm.

21. That the Provincial Government address the issue of decreased tax revenues and increased land acquisition costs which may result from the identification and designation of flood plains.

22. That CMHC be requested to clarify its position relative to the provision of mortgage funding for existing developed properties within an identified flood plain.

23. That the Minister of Natural Resources undertake a public review of provincial shoreline management policies.

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